MSTV Presentation/Discussion with OET

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- FCC Test Plan and Schedule
 - Test Objectives?
- MSTV October 15 letter to OET
 - Specific Questions Raised
- Status of MSTV Recommendations and Suggestions



- Laboratory tests should measure performance that is representative of actual use. For example, following are some of the suggestions made:
 - Performance of antenna system used for sensing must be included in laboratory tests
 - Impact of close-in obstructions such as the body must be taken into account to determine actual results in laboratory tests
 - Effect of multiple DTV signals, including 3rd order IM that will occur in practice, should be laboratory tested to determine impact



- Laboratory tests should measure performance that is representative of actual use. For example, following are some of the suggestions made (cont'd):
 - Sensing acquisition time must tested and limited to realistic operational values
 - Impact of transmitter on sensing receiver
 - Typical co-channel and adjacent channel interference ranges need to be determined



- Field testing should include enough different locations to be representative of both TV reception and unlicensed operation throughout the United States. For example:
 - Urban, suburban and rural areas should be represented
 - Variations in terrain, vegetation and other features that affect propagation
 - Seasonal variation should also be taken into account
 - Testing should include areas with significant number of TV stations in operation including adjacent channel, second adjacent channel, channels with IM relationships and areas with relatively few stations in operation



Recent Filings

- Motorola
 - Failed to address adjacent channel interference
- Google
 - Submitted data shows -120 dBm sensing level inadequate
 - Raises antenna performance issue



Recent Filings

- Motorola
 - Co-channel interference and analysis
 - Addressed cable interference
 - Suggests 10 mW output power solution
 - Failed to provide adjacent channel "over-the-air" analysis for fixed or mobile
- Reducing power to 10 mW does NOT eliminate adjacent channel interference
- Using FCC curves to determine adjacent channel operation will not eliminate interference



Adjacent Channel Protection

- FCC Receiver Tests measured "best case" adjacent channel receiver performance
 - Sample included only "best" TVs
 - Extreme filtering to ensure only out of channel effects measured
 - Real world "in band" splatter ignored
 - Adjacent channel D/U ratio of -40 dB
- ATSC A/74 Recommendations
 - Adjacent channel D/U of -33 dB (moderate and weak)
- CRC, U of K
 - Adjacent channel D/U less than -33 dB measured
- Existing FCC Rules for LPTV
 - Lower Adjacent channel D/U for strong signal case



Adjacent Channel Protection

"Best Case" for WSD Manufacturers (D/U of -40 db)

100 mW Case

- 100mw = 20 dBm
- 10 m Free Space Path Loss= 48 dB
- 100 mW transmitter at 10 meters is -28 dBm
- Interference caused to viewers with TV signal less than -68 dBm

10 mW Case

- 10 mW = 10 dBm
- 10 m Free Space Path Loss= 48 dB
- 10 mW transmitter at 10 meters is -38 dBm
- Interference cause to viewers with TV signal less than -78 dBm



Adjacent Channel Protection

- Bottomline: Even under "best case" scenario interference will be caused to TV viewers
- Part 15 standards can not be based on situation where interference is guaranteed to occur to the public
- Mobile DTV service calls into question both 10m distance and measured D/Us



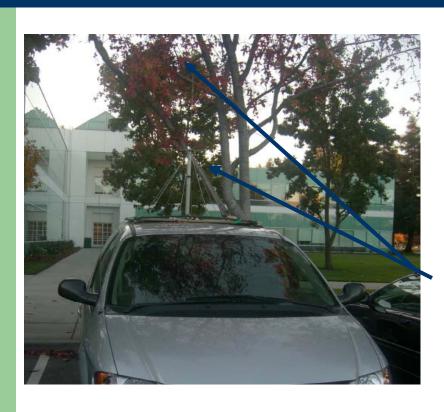
Recent Google Filing



- Provided indoor and outdoor test data
- States that device has average sensitivity of -120 dBm level
- Data indicates that device will not accurately detect viewable DTV signals
- Raises practical antenna performance issues



Antenna Performance and Sensing Level



- How do you take the antenna performance into account for sensing level
- Moore's law holds for electronics not antenna performance
- Not a particularly practical personal portable antenna design



Antenna Performance and Sensing Level



- Actual antenna gain and performance affects required sensing level
- 0 dBi not practical or realistic

Signal Level Here Doesn't Matter

Signal Level Here Matters

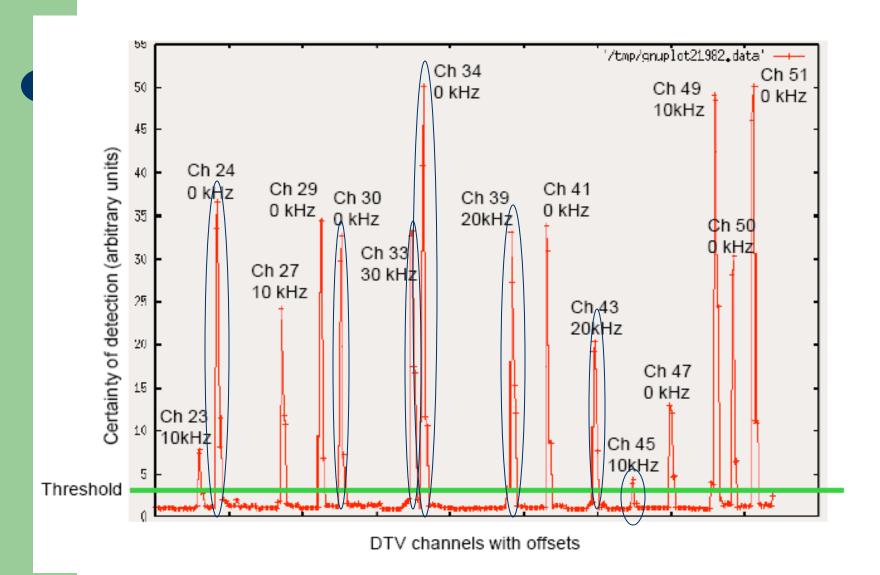


Antenna Performance and Sensing Level

- FCC proposed rule <u>referenced</u> to 0 dBi antenna but best practical mobile antenna designs are about -7 to -10 dBi over more limited spectrum range
 - Cellular radio designs
 - Mobile TV applications
 - Qualcomm MediaFlo/DVB-H and T-DMB
- EBU TECH 3317 Planning parameters for hand held reception
 - "The antenna in a small hand-held terminal has to be an integral part of the terminal construction and will therefore be small when compared to the relevant wavelength. ... The restive part of the antenna impedance (radiation resistance), which is to be matched to the receiver input impedance, will be rather small ... This leads to rather high losses and to low overall efficiency. ..."
 - "Current understanding of the overall design problem indicates that a typical antenna gain at lowest UHF-band frequencies would be in the order of -10 dBi ..."
 - EBU document also notes that the relative position of the user and body absorption/reflection loss can cause additional signal loss

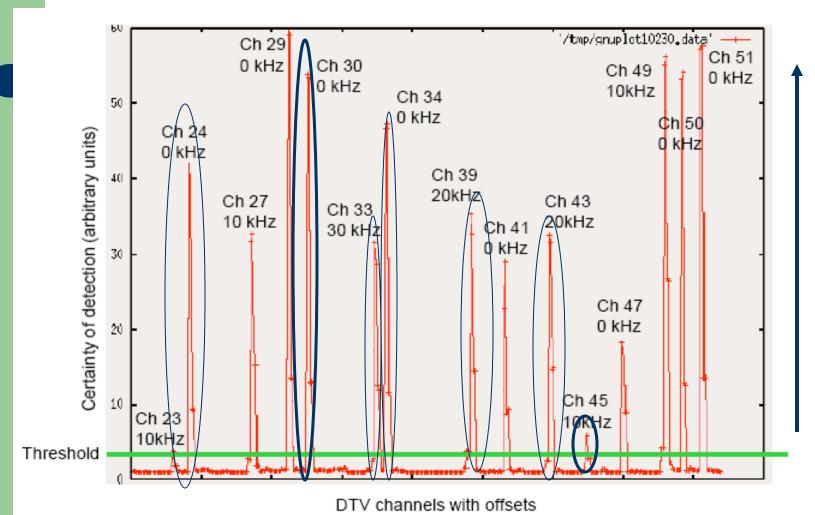


Google Outdoor Results





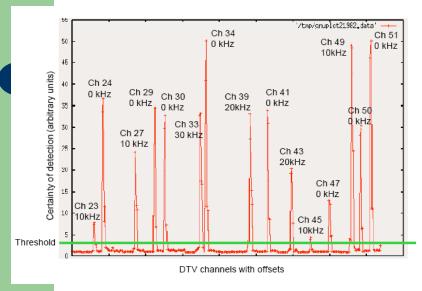
Google Indoor Results (Circled results at same location)

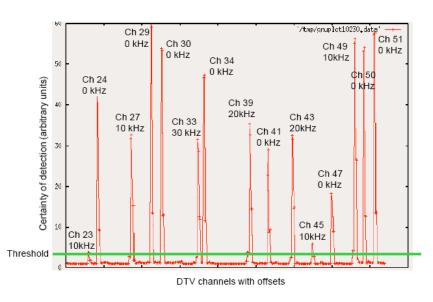


50 unit difference for 2 db difference power and height



Google Results





Indoor Measurements

Outdoor Measurements

- Significant differences in outdoor and indoor measurements suggest that even -120 dBm sensing level unreliable
 - Channel 29 +25 units
 - Channel 34 -10 units
 - Channel 50 +20 units
- Threshold level for channel 45 at only 30 miles provides strong indication of sensing failure



TV Stations

All licensed (or CP) DTV stations within 200 km of N 37° 25' 12.26", W 122° 4' 59.40" (Mountain View, CA):

Call	Ch	1	Status	City ERP		HAAT		Latitude			Longitue			ıde		Distance		Det
VT-KAMN	21	ND	LIC	SACRAMENTO	850.	kW	581.2	N	138	15	54.00		121	129	[24.00]	107.33	km	
KRCB	23	DA	CP MOD	COTATI	105.	kW	630.4	N	[38	20	54.70	W	122	34	37.50	111.B4	km	*
KGD-TY	124	DA	LIC	SAN FRANCISCO	561.	k₩	1437.0	N	137	45	19.00	W	122	127	j6.00	49.43	km	*
KOVR	125	ND	LIC	STOCKTON	760.	kW	591.0	N	138	114	24.00	W	121	130	13.00	104.45	km	
KTSF	127	Dλ	LIC	SAN FRANCISCO	500.	kW	403.4	N	j37	41	12.00	W	122	126	j3.00	42.B7	km	. *
KPIX-TV	j29	DA	LIC	SAN FRANCISCO	1000.	kW	j401.0	N.	137	145	20.00	į W	1122	j27	j5.00	1 49.44	km	, *
KQED	130	DA	LIC	SAN FRANCISCO	777.	kW	[437.0	N	137	45	19.00	W	122	127	[6.00	49.43	km	#
KSMS-TV	31	Dλ	CP	MONTEREY	50.	kW	j700.6	N.	136	45	23.00	į W	121	130	j5.00	90.00	km	İ
KION-TV	j32	DA	іьіс	MONTEREY	i46.	kW	j758.0	į N	j36	j 32	j5.00	į W	j121	j37	i14.00	i 106.54	km	İ
KMTP-TV	[33	ND	CP	SAN FRANCISCO	[50U.	kW	j496.U	N	j37	45	19.00	į W	122	127	j6.UU	49.43	km	j *
KFSF-TV	134	DA	LIC	VALLEJO	150.	kW	[419.0	N	137	45	[19.00	W	122	127	[6.00	49.43	km	*
KCRA-TV	35	ND	LIC	SACRAMENTO	1000.	kW	462.0	N	138	14	50.00	W	121	130	3.00	105.15	km	
KCNS	139	DA	LLIC	SAN FRANCISCO	1000.	kW	1428.0	N	137	45	119.00	W	1122	127	[6.00	49.43	km	*
KKPX	41	DA	LIC	SAN JOSE	1000.	kW	418.0	N	37	41	15.00	$\mid \mathbb{W} \mid$	122	26	1.00	42.B9	km	*
KCSM-TV	143	DA	LIC	SAN MATED	1536.	kW	1428.0	- N	137	45	19.00	+W	122	127	16.00	49.43	km	*
KBCW	45	DA	LIC	SAN FRANCISCO	1400.	ΚW	1446.0	N	137	45	19.00	+W	122	127	[6.00	49.43	km	#
KQCA	46	ND	LTIC	STOCKTON	[600.	kW	580.0	N	138	15	54.00	W	121	129	24.00	107.33	km	
KTLN-TV	147	DA	CP	NOVATO	1000.	kW	1402.0	N	138	19	0.00	W	122	135	31.00	92.59	km	*
KSPX	48	DA	LIC	SACRAMENTO	1000.	kW	489.0	N	138	15	54.00	W	121	129	[24.00	107.33	km	
KSTS	149	DA	LTIC	SAN JOSE	[257]	kW	[688.0	N	137	129	57.00	W	1121	152	16.00	20.71	km	*
KTEH	50	DA	LIC	SAN JOSE	290.	kW	[662.0	N	137	29	17.00	W	121	51	[59.00	20.61	km	*
KDTY	51	DA	LIC	SAN FRANCISCO	1476.3	k₩	701.0	N	137	129	57.00	W	121	152	116.00	20.71	km	*

Can see every station not occluded by mountains, including several not receivable by DTV tuners.



Mobile DTV Service Update

- Mobile DTV systems now being demonstrated in number of markets
- ATSC finalizing laboratory and field test plans and documents
- Open Mobile Video Coalition establishing IDOV laboratory and field test program